

**THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: § Chapter 7
§
DENNIS MCLAUGHLIN, § Case No. 10-35641-7
§
Debtor. §
§

MOTION TO WITHDRAW

Pursuant to Local Bankruptcy Rule 2091-1, Weinstein Tippetts & Little LLP (“WTL”) files the following Motion to Withdraw as counsel for creditor Praxair Inc. In support of its motion, WTL respectfully shows as follows:

1. Praxair Inc. originally retained WTL to represent it in a commercial dispute among Praxair, Debtor Dennis McLaughlin, and two non-debtor, corporate defendants. Litigation related to the dispute is pending in the United States District Court for the Northern District of Texas as *Praxair, Inc. v. Apollo Resources International, Inc. et al.*, Case No. 3:09-cv-02014-K. The District Court, *sua sponte*, severed Debtor McLaughlin from the case following his bankruptcy petition.
2. Shortly after Debtor McLaughlin’s case commenced, WTL entered a notice of appearance on behalf of creditor Praxair in this case. WTL’s appearance was for the limited purpose of receiving notices that might relate to Praxair’s District Court litigation.
3. Since the District Court has severed Debtor McLaughlin from that pending litigation, WTL and Praxair have agreed that Praxair, to the extent it deems appropriate, will retain separate bankruptcy counsel to represent it in this case.
4. As required by Local Bankruptcy Rule 2091-1, Praxair’s consent to WTL’s withdrawal as its counsel is indicated by the signature of its in-house counsel below.

5. In further compliance with the rule, Praxair requests that all future notices in this case be directed to:

SUSAN B. HERSH, P.C.
12770 Coit Road, Suite 1100
Dallas, Texas 75251
(972) 503-7070
(972) 503-7077 (Fax)
susan@susanbhershpc.com

Based on the foregoing, WTL respectfully requests the Court grant its Motion to Withdraw.

Respectfully submitted,

Weinstein Tippetts & Little LLP

By: /s/ S. Fay Peterson
State Bar No. 24013319
7660 Woodway, Suite 500
Houston, Texas 77063
Tel. 713-244-0800
Fax 713-244-0801
email: fay.peterson@wtllaw.com

Certificate of Conference

Pursuant to Local Bankruptcy Rule 7007-1(a), WTL states that given the number of parties who have entered appearances in this case, it is impracticable for WTL to conduct a conference with each such party to determine whether any party is opposed to this motion. However, WTL states is it unaware of any grounds upon which a party will oppose the motion.

/s/ S. Fay Peterson

Certificate of Service

I, the undersigned, hereby certify that, on November 11, 2010 I caused to be served the foregoing notice upon all parties receiving service via the Court's electronic transmission facilities.

/s/ S. Fay Peterson